



Annual Performance Report Form

Facility Name: USGen New England, Inc. - Hydro Generation

Performance Track ID #: A010021

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: April 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☐ Name of your facility: USGen New England, Inc. - Hydro Generation
- A.2 ☐ Name of your parent company: PG&E National Energy Group
- A.3 ☐ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Ms. Maryalice Fischer
Title: Environmental Manager
Phone: (603) 225-5528 Fax: (603) 225-3260 E-mail: maryalice.fischer@neg.pge.com
- A.4 ☐ Facility's location
Street Address: 46 Centerra Parkway, Suite 100
Street Address (cont.):
City/State/Zip Code: Lebanon, NH 03766
- A.5 ☐ Facility's website address (if any): www.neg.pge.com/sites_regions/
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:
☐ Fewer than 50 ☒ 50 - 99 ☐ 100 - 499 ☐ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 221111
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☐ Yes ☒ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

June 13-14, 2001. Comprehensive EMS audit conducted at a subset of applicable sites. Audit followed ISO-14001 and corporate EMS audit protocols. The scope of the audit was focussed on evaluation of how well the facilities have delineated environmental risks, identified requirements, and set targets and objectives to minimize or control those risks including pollution prevention and continuous improvement; assigned roles and responsibilities; established procedures; and trained and communicated these objectives and responsibilities to employees; taken steps to monitor and inspect the effectiveness of the controls in place to manage those risks identified and correct any problems; and undertaken measures to assess and improve the EMS.

c. Was a compliance audit conducted? ☐ Yes ☒ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

N/A

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

None were conducted.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

- Environmental Policy was revised, publically posted, and reviewed with all employees.
- Aspect/Impact evaluation was broadened to include vendor impacts and operational controls.
- Management of Change procedures were expanded and formalized.
- Documentation and written procedures were revised and clarified.
- Self assessment and corrective action processes were expanded.
- Management review was expanded to include entire management team.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☒ Yes ☐ No ☐ No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed? *mo/yr* 10/01

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Michael G. Kline

Title: Managing Director of Hydro Generation

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☐ Yes ☒ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* 09/01

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the reporting year.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Preservation and Restoration - Remediation	See Section C
Waste - Hazardous Solid Waste	See Section C - This aspect and commitment have been discontinued due to low frequency of the task. See "Preservation, Restoration - Habitat Impacts aspect below which is the replacement commitment for 2001 and beyond.
Energy Use	See Section C
Materials Use - Recycling and recycled products	See Section C
Preservation and Restoration - Habitat Impacts	New Performance Track Commitment - see Attachment.
Accidental Releases - Vulnerability and potential for releases	Eliminated 2600 gallons of transformer mineral oil dielectric fluid located near water by replacing four circa 1924 transformer units with a single new unit.

Section B

(continued)

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the *reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Air Emissions - CFCs and Greenhouse Gases	An inert gas fire suppression system was installed in 2001 at the Bear Swamp site, avoiding the use of 12,000 cubic feet of CFCs and/or greenhouse gases found in standard fire suppression systems.
Preservation, Restoration - Habitat Impacts	Installed "deer alerts" (sonic devices to warn away wildlife) on approximately 30 company vehicles and approximately 80 employee vehicles. The number of vehicle-wildlife accidents without deer alerts was 3 in 2000, reduced to 0 in 2001 with deer alerts installed. Also registered 21 company vehicles in VT and NH (MA does not have this program for commercial vehicles) with conservation license plates to support state wildlife conservation efforts.

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Preservation and Restoration (formerly Discharges, Releases)					
Aspect (see page 16 of the instructions): Remediation - Reduce potential for release of toxics to land and water via lead paint stabilization and removal projects. Non-lead paints also removed but not counted here.					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	0	48			(optional)
<i>Measurement Units</i>	Number of projects completed.				
<i>Normalizing Factor*</i>	1.0	1.0			(optional)
<i>Basis for your Normalizing Factor*</i>	Number of facilities and structures owned by USGen.				
<i>Normalized Quantity* (per year)</i>	0	48			166 projects
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Sites were surveyed for paint in poor condition. Some areas were tested for lead content, some were assumed to be lead paint. Contractors were deployed and paint stabilization projects were conducted. 39,500 square feet of lead paint in 48 projects was stabilized in 2001.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).
N/A

Section C

(continued)

C.2

Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Waste					
Aspect (see page 16 of the instructions): Hazardous Solid Waste					
	<i>Baseline</i> (as stated in your application)	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> (the goal stated in your application)
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity</i> (per year)	9000	0			(optional)
<i>Measurement Units</i>	Pounds of oily debris and solvent waste generated by old cleaning process.				
<i>Normalizing Factor*</i>	1.0	0			(optional)
<i>Basis for your Normalizing Factor*</i>	Number of turbine units cleaned each year by new cleaning process.				
<i>Normalized Quantity*</i> (per year)	9000	0			9000 per year
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

No turbine units were cleaned in 2001. Therefore no reductions in waste generation from this operation were realized. While there may be some reductions in future years, this operation is not utilized frequently enough to have much waste reduction impact. This commitment has been deleted and replaced with another (see attachment).

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

N/A

Section C

(continued)

C.3

Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): Energy Use					
Aspect (see page 16 of the instructions): Total houseload electrical use					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	12,482,000 *	8,189,000			(optional)
<i>Measurement Units</i>	estimated annual kWh used for houseload.				
<i>Normalizing Factor*</i>	1.0	0.7			(optional)
<i>Basis for your Normalizing Factor*</i>	Hydro generation production level (net MWh generated for wholesale market)				
<i>Normalized Quantity* (per year)</i>	12,482,000	11,699,000 **			11,233,800 to 11,857,900 *
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

* Note: Baseline value revised up from 12,000,000 kWh in original PT application. Original commitment was 5-10% reduction from baseline level.

** Note: Not all houseload use is correlated with facility production level.

During 2001, an energy consultant conducted a comprehensive survey of energy use and reduction potential at all sites. Recommendations were made for improvements. Some savings were realized from limited lighting controls, water heater replacements and timers, process changes and insulation measures. An estimated 176,500 kWh was reduced in 2001, or 1.4 % of baseline year houseload use.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).
N/A

Section C

(continued)

C.4

Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Materials Use

Aspect (see page 16 of the instructions): Recycled materials purchasing and use.

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	0	4950			(optional)
<i>Measurement Units</i>	Pounds (of recycled copy paper, paper towels and bath tissue) purchased				
<i>Normalizing Factor*</i>	1.0	1.0			(optional)
<i>Basis for your Normalizing Factor*</i>	Number of employees				
<i>Normalized Quantity* (per year)</i>	0	4950			4950 *

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

* Note: Original commitment was to replace 100% of virgin paper products with recycled content.

Suppliers of recycled content paper and towels were located and requested to provide these products routinely. Beyond the original commitment, two initiatives have been implemented:

1. Purchasing practices now include recycled content office products (file folders and boxes, envelopes, plastic garbage bags, envelopes, pencils, etc) totaling approximately 500 pounds 2001.
2. Recycling of used office paper was implemented at 4 additional site offices, one site office recycled in 2000.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

N/A

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

USGen New England Hydro is actively involved in community and region-based environmental organizations with two full-time Community Relations Specialists who coordinate the company's interactions with 53 host communities and local, regional, state and federal stakeholders.

The company owns 32,000 acres of land virtually all of which is open to the public, and also maintains a variety of recreation areas in conjunction with the hydro plants. These facilities provide approximately 500,000 visitors/year with high quality recreational activities including hiking, boating, picnicing, swimming, fishing, whitewater boating, cross country skiing and snowmobiling.

The company holds membership in various environmental groups. Numerous meetings were attended and applicable and timely environmental issues were discussed (ie: wetlands issues, water quality, environmental enhancements, fish passage etc) on numerous occasions including regular meetings of The Connecticut River Joint Commissions; Connecticut River Watershed Association; Deerfield River Watershed Initiative Team; Deerfield River Watershed Association; and meetings of the Fifteen Mile Falls FERC Relicensing Stakeholders and state and federal agencies.

Facility plant tours and outreach were conducted by USGen staff with the Connecticut River Steward; school groups; and local emergency response personnel. Four Visitor Centers were open from Memorial Day through Columbus Day, allowing the public to view fish passage facilities, historical artifacts, stewardship activities, and learn how hydropower is made.

Information on threatened and endangered species; habitat improvements and organic farming initiatives (refer to Attachment) were shared with The Nature Conservancy, Audubon Society, local farmers; US Dept. of Agriculture; and local community groups.

Information related to Deerfield River FERC License enhancements were shared in meetings and via written documents with Deerfield River License Stakeholders including Trout Unlimited, American Whitewater, Connecticut River Atlantic Salmon Commission, and state and federal agencies.

Public inquiries were received and responded to on several specific topics including USGen's integrated vegetation management program and herbicide use; river erosion; and water quality testing results.

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☒ Website (URL www.neg.pge.com/sites_regions/)

☐ Open House

☒ Meetings

☐ Press Releases

☐ Community Advisory Panel

☒ Other Make available copies in Hydro Visitor Centers, and deliver to interested community, watershed and NGO groups.

Section E

Self-Certification of Continued Program Participation

On behalf of USGen New England, Inc. - Hydro Generation,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____ April 30, 2002 revised

Printed Name Mr./Mrs./Ms./Dr. Michael G. Kline

Title Managing Director of Hydro Generation

Phone Number/E-mail Address (617) 788-3379

Facility Name USGen New England, Inc. - Hydro Generation

Facility Street Address 46 Centerra Parkway, Suite 100 Lebanon NH 03766

Performance Track Identification Number A010021

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The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

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